

### **REMARKS**

This response is intended as a full and complete response to the Office Action mailed on August 9, 2006. In view of the following discussion, the Applicants believe that all claims are in allowable form.

### **CLAIM REJECTIONS**

#### **35 U.S.C. §102      Claims 1-5, 8, 10 and 12-16**

Claims 1-5, 8, 10 and 12-16 stand rejected under 35 U.S.C. § 102(b) as being anticipated by United States Patent No. 6,197,150 issued March 6, 2001 to *Kwag, et al.* (hereinafter referred to as *Kwag*). In response, the Applicants have amended 1, 5 and 12 to more clearly recite certain aspects of the invention.

Independent claims 1 and 12 recite elements not taught or suggested by *Kwag*. *Kwag* teaches a chuck 8 having a plurality of holes 12 on the upper surface defining a buffer space 10 on the bottom surface. (Col. 4, Lines 3-7, Figure 3). The chuck has a clamp 16 that extends over the wafer to secure the wafer to the chuck 8. (Col. 3, Lines 52-55, Col. 6, Lines 57-62). However, *Kwag* does not teach or suggest an annular substrate support ring circumscribing the fluid diffusion member and having a portion extending inward over the fluid diffusion member, as recited by claim 1, or an annular substrate support ring having at least one substrate support arm extending inwardly over the upper surface of the fluid diffusion member, as recited by claim 12.

Thus, the Applicants submit that independent claims 1 and 12, and all claims depending therefrom, are patentable over *Kwag*. Accordingly, the Applicants respectfully request that the rejection be withdrawn and the claims allowed.

#### **35 U.S.C. §103      Claims 6 and 7**

Claims 6 and 7 stand rejected under U.S.C. § 103(a) as being unpatentable over *Kwag* in view of United States Patent Publication No. 2002/0195128 published December 26, 2002, to *Shibagaki* (hereinafter referred to as "*Shibagaki*"). In response, the Applicants have amended claim 1 to more clearly recite certain aspects of the invention.

Independent claim 1, from which claims 6 and 7 depend, recites elements not taught or suggested by the combination of *Kwag* and *Shibagaki*. The teaching of *Kwag* has been discussed above. *Shibagaki* teaches different configurations of injection ports 51 disposed in a center portion of a substrate support. *Shibagaki* fails to teach or suggest a modification to *Kwag* that would yield an annular substrate support ring circumscribing the fluid diffusion member and having a portion extending inward over the fluid diffusion member, as recited by claim 1. Thus, a *prima facie* case for obviousness has not been established as the references fail to teach or suggest all the elements recited by claim 1.

Thus, the Applicants submit that claims 6 and 7 that depend from claim 1 are patentable over the combination of *Kwag* and *Shibagaki*. Accordingly, the Applicants respectfully request the rejection be withdrawn and claims allowed.

### **35 U.S.C. §103      Claim 9**

Claim 9 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over *Kwag* in view of United States Patent No. 6,239,038 issued May 29, 2001 to *Wen, et al.* (hereinafter referred to as "*Wen*"). In response, the Applicants have amended claim 1 to more clearly recite certain aspects of the invention.

Independent claim 1, from which claim 9 depends, recites elements not taught or suggested by the combination of *Kwag* and *Wen*. The teaching of *Kwag* has been discussed above. *Wen* teaches a fluid heater 54 utilized to heat the processing fluid supplied through a fluid conduit 32. However, *Wen* fails to suggest a modification to *Kwag* that would yield an annular substrate support ring circumscribing the fluid diffusion member and having a portion extending inward over the fluid diffusion member, as recited by claim 1. Thus, a *prima facie* case for obviousness has not been established as the references fail to teach or suggest all the elements recited by claim 1.

Thus, the Applicants submit that claim 9, that depends from claim 1, is patentable over *Kwag* in view of *Wen*. Accordingly, the Applicants respectfully request that the rejection be withdrawn and the claim allowed.

**35 U.S.C. §103      Claim 11**

Claim 11 stands rejected under U.S.C. § 103(a) as being unpatentable over *Kwag* in view of United States Patent No. 5,294,778 issued March 15, 1994, to *Carman, et al.* (hereinafter referred to as "*Carman*"). In response, the Applicants have amended claim 1 to more clearly recite certain aspects of the invention.

Independent claim 1, from which claim 11 depends, recites elements not taught or suggested by the combination of *Kwag* and *Carman*. The teaching of *Kwag* has been discussed above. *Carman* teaches multiple heaters 54 disposed in a lower side of a substrate support to heat a substrate disposed thereon. *Carman* fails to teach or suggest a modification to *Kwag* that would yield an annular substrate support ring circumscribing the fluid diffusion member and having a portion extending inward over the fluid diffusion member, as recited by claim 1. Thus, a *prima facie* case for obviousness has not been established as the references fail to teach or suggest all the elements recited by claim 1.

Thus, the Applicants submit that claim 11, that depends from claim 1, is patentable over the combination of *Kwag* and *Carman*. Accordingly, the Applicants respectfully request the rejection be withdrawn and claim allowed.

**35 U.S.C. §103      Claim 17**

Claim 17 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over *Kwag* in view of United States Patent No. 5,566,744 issued October 22, 1996 to *Tepman*, (hereinafter referred to as "*Tepman*"). In response, the Applicants have amended claim 12 to more clearly recite certain aspects of the invention.

Independent claim 12, from which claim 17 depends, recites elements not taught or suggested by the combination of *Kwag* and *Tepman*. The teaching of *Kwag* has been discussed above. *Tepman* teaches a fluid transfer conduit 308 used to feed fluid to a substrate surface. However, *Tepman* fail to suggest a modification to *Kwag* that would yield an annular substrate support ring having at least one substrate support arm extending inwardly over the upper surface of the fluid diffusion member, as recited by claim 12. Thus, a *prima facie* case for obviousness has not been established as the references fail to teach or suggest all the elements recited by claim 12.

Thus, the Applicants submit that claim 17, that depends from claim 12, is patentable over *Kwag* in view of *Tepman*. Accordingly, the Applicants respectfully request that the rejection be withdrawn and the claim allowed.

**35 U.S.C. §103      Claim 18**

Claim 18 stand rejected under U.S.C. § 103(a) as being unpatentable over *Kwag* in view of *Shibagaki*. In response, the Applicants have amended claim 12 to more clearly recite certain aspects of the invention.

Independent claim 12, from which claim 18 depends, recites elements not taught or suggested by the combination of *Kwag* and *Shibagaki*. The teaching of *Kwag* has been discussed above. *Shibagaki* teaches different configurations of injection ports 51 disposed in a center portion of a substrate support, as set forth above. However, *Shibagaki* fail to teach or suggest a modification to *Kwag* that would yield an annular substrate support ring having at least one substrate support arm extending inwardly over the upper surface of the fluid diffusion member, as recited by claim 12. Thus, a *prima facie* case for obviousness has not been established as the references fail to teach or suggest all the elements recited by claim 12.

Thus, the Applicants submit that claim 18, that depends from claim 12, is patentable over the combination of *Kwag* and *Shibagaki*. Accordingly, the Applicants respectfully request the rejection be withdrawn and the claim allowed.

**35 U.S.C. §103      Claim 19**

Claim 19 stands rejected under U.S.C. § 103(a) as being unpatentable over *Kwag* in view of *Carman*. In response, the Applicants have amended claim 12 to more clearly recite certain aspects of the invention.

Independent claim 12, from which claim 19 depends, recites elements not taught or suggested by the combination of *Kwag* and *Carman*. The teaching of *Kwag* has been discussed above. *Carman* teaches multiple heaters 54 disposed in a lower side of a substrate support to heat a substrate disposed thereon. *Carman* fails to teach or suggest a modification to *Kwag* that would yield an annular substrate support ring

having at least one substrate support arm extending inwardly over the upper surface of the fluid diffusion member, as recited by claim 12.

Thus, the Applicants submit that claim 19, that depends from claim 12, is patentable over the combination of *Kwag* and *Carman*. Accordingly, the Applicants respectfully request the rejection be withdrawn and the claim allowed.

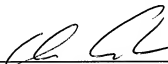
### CONCLUSION

Thus, for at least the reasons discussed above, the Applicants submit that all claims now pending are in condition for allowance. Accordingly, both reconsideration of this application and swift passage to issue are earnestly solicited.

If the Examiner believes that any unresolved issues still exist, it is requested that the Examiner telephone Keith Taboada at (732) 530-9404 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Respectfully submitted,

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Date



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